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February 19, 2019

Marlene H. Dortch, Office of the Secretary
Federal Communications Commission
445 12th Street, SW
Suite TW-A325
Washington, D.C. 20554

Re: EB Docket No. 06-36
Annual 47 C.F.R. § 64.2009(e) CPNI Certification for 2018

Bluegrass Cellular, Inc.
Kentucky RSA #3 Cellular General Partnership
Kentucky RSA 4 Cellular General Partnership
Cumberland Cellular Partnership
Bluegrass Wireless LLC

Dear Ms. Dortch:

On behalf of Bluegrass Cellular, Inc. and its affiliates, and pursuant to Section 64.2009(e) of FCC rules, submitted herewith is the carriers' joint CPNI certification with accompanying statement covering calendar year 2018.

Should any questions arise regarding this submission, please contact the undersigned.

Very truly yours,



Pamela L. Gist

Annual 47 C.F.R. § 64.2009(e) CPNI Certification
EB Docket No. 06-36

Annual 64.2009(e) CPNI Certification for 2018

Date filed: February 19, 2019

Name of companies covered by this certification:

Bluegrass Cellular, Inc.
For and on behalf of

Kentucky RSA #3 Cellular General Partnership
499 Filer ID 802218

Kentucky RSA 4 Cellular General Partnership
499 Filer ID 802215

Cumberland Cellular Partnership
499 Filer ID 802221

Bluegrass Wireless LLC
499 Filer ID 825310

Address: P.O. Box 5012
Elizabethtown, Kentucky 42702

Name of signing officer: Sherry Powers

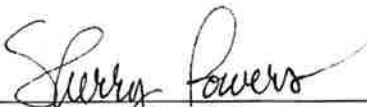
Title of signatory: Vice President – Administration & Customer Service

CERTIFICATION

I, Sherry Powers, hereby certify that I am an officer of the companies named above, and acting as an agent of the companies, that I have personal knowledge that the companies have established operating procedures that are adequate to ensure compliance with the Customer Proprietary Network Information rules set forth in 47 C.F.R. §§ 64.2001 *et seq.* of the rules of the Federal Communications Commission.

Attached to this certification is an accompanying statement which (i) explains how the companies' procedures ensure that the companies are in compliance with the requirements set forth in 47 C.F.R. §§ 64.2001 *et seq.* of the Commission's rules, (ii) explains any action taken against data brokers during the past year, (iii) reports information known to the companies regarding tactics pretexters may be using to attempt access to CPNI, and (iv) summarizes any customer complaints received in the past year concerning the unauthorized release of CPNI.

The companies represent and warrant that the above certification is consistent with 47 C.F.R. § 1.17 which requires truthful and accurate statements to the Commission. The companies also acknowledge that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.



Sherry Powers, Vice President – Administration & Customer Service

Date: February 19, 2019

Company Names (Collectively referred to as "Carrier"):

Bluegrass Cellular, Inc.

For and on behalf of

Kentucky RSA #3 Cellular General Partnership

Kentucky RSA 4 Cellular General Partnership

Cumberland Cellular Partnership

Bluegrass Wireless LLC

STATEMENT

Carrier has established operating procedures that ensure compliance with the Federal Communication Commission ("Commission") regulations regarding the protection of customer proprietary network information ("CPNI").

- Carrier has adopted a manual and keeps it updated with FCC CPNI rule revisions and has designated a CPNI compliance officer to oversee CPNI training and implementation.
- Carrier continually educates and trains its employees regarding the appropriate use of CPNI. Carrier has established disciplinary procedures should an employee violate the CPNI procedures established by Carrier.
- Carrier has implemented a system whereby the status of a customer's CPNI approval can be determined prior to the use of CPNI.
- Carrier maintains a record of its and its affiliates' sales and marketing campaigns that use its customers' CPNI. Carrier also maintains a record of all instances where CPNI was disclosed or provided to third parties, or where third parties were allowed access to CPNI. The record includes a description of each campaign, the specific CPNI that was used in the campaign, and what products and services were offered as a part of the campaign.
- Carrier has established a supervisory review process regarding compliance with the CPNI rules with respect to outbound marketing situations and maintains records of carrier compliance for a minimum period of one year. Specifically, Carrier's sales personnel obtain supervisory approval of any proposed outbound marketing request for customer approval regarding its CPNI, and a process ensures that opt-out elections are recorded and followed.
- Carrier has implemented procedures to properly authenticate customers prior to disclosing CPNI over the telephone, at Carrier's retail locations or otherwise and in connection with these procedures, Carrier has established a system of passwords and back-up authentication methods which complies with the requirements of applicable Commission rules.
- Carrier has established procedures to ensure that customers will be immediately notified of account changes including changes to passwords, back-up means of authentication for lost or forgotten passwords, or address of record.
- Carrier has established procedures to notify law enforcement and customer(s) of unauthorized disclosure of CPNI in accordance with FCC timelines.

- Carrier took the following actions against data brokers in 2018, including proceedings instituted or petitions filed by Carrier at a state commission, in the court system, or at the Federal Communications Commission:
 - No instances of CPNI violations stemming from data brokers, no action taken
- The following is information Carrier has with respect to the processes pretexters are using to attempt to access CPNI, and [if any] what steps carriers are taking to protect CPNI:
 - Call Center: Persons calling stating that they are the account holder when they are not – Verification of personal information prior to discussing the account information is used to protect CPNI. Detail call records are only mailed to the account billing address (never faxed or sent to another address).
 - Retail Location - Persons stating that they are the account holder when they are not – Verification of picture id prior to discussing any account information or release of bills or call records.
- The following is a summary of all customer complaints received in 2018 regarding the unauthorized release of CPNI:

- Number of customer complaints Carrier received in 2018 related to unauthorized access to CPNI, or unauthorized disclosure of CPNI:

Category of complaint:

2 Number of instances of improper access by employees

1 Number of instances of improper disclosure to individuals not authorized to receive the information

1 Number of instances of improper access to online information by individuals not authorized to view the information

0 Number of other instances of improper access or disclosure

- Summary of customer complaints received in 2018 concerning the unauthorized release of CPNI:
 - 5/3/18: Customer alleged that a retail staff member, related to his wife, discloses call activity to his wife. A review of activity logs confirms no access. CPNI Investigation confirms a violation did not occur.

- 6/8/18: Customer alleged that an employee disclosed account information to a non-authorized person. After listening to recorded calls, the CPNI Investigation confirms a violation did not occur.
- 6/13/18: Internal review demonstrated that a retail staff member assisted an authorized user to access account holder's online account. CPNI Investigation confirms that this violation did occur.
- 11/8/18: Customer alleges that a retail employee improperly accessed his account. Upon review of activity logs, CPNI Investigation confirms this violation did not occur.